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6 Attorneys for Defendant  
SALVADOR ORTIZ-PADILLA  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 SALVADOR ORTIZ-PADILLA,

15 Defendant.  
16

Case No. 1:21-cr-00239-JLT-SKO

STIPULATION TO VACATE TRIAL AND SET  
CHANGE OF PLEA HEARING; ORDER

17 IT IS HEREBY STIPULATED, by and between the parties through their respective  
18 counsel, Assistant United States Attorney Justin Gilio, counsel for plaintiff, and Assistant  
19 Federal Defender Reed Grantham, counsel for Salvador Ortiz-Padilla, that the trial currently  
20 scheduled for October 24, 2023, may be vacated and a change of plea hearing date be set for  
21 October 23, 2023, at 10:00 a.m.

22 The parties are in the process of finalizing a plea agreement in this matter, and, as a  
23 result, are requesting to vacate the current trial date, and to set a change of plea hearing for  
24 October 23, 2023. This will provide time for the parties to finalize the plea documents prior to  
25 the change of plea hearing.

26 The requested continuance is made with the intention of conserving time and resources  
27 for both the parties and the Court. The government is in agreement with this request and the  
28 requested date is a mutually agreeable date for both parties. The parties stipulate that for the

1 purpose of computing time under the Speedy Trial Act, the Court should exclude time from the  
2 date of this order through October 23, 2023, for defense preparation and investigation, pursuant  
3 to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties agree that the ends of justice are served by  
4 resetting the status conference date outweigh the best interest of the public and the defendant in a  
5 speedy trial.

6  
7 Respectfully submitted,

8 HEATHER E. WILLIAMS  
9 Federal Defender

10 Date: September 8, 2023

/s/ Reed Grantham  
11 REED GRANTHAM  
12 Assistant Federal Defender  
13 Attorney for Defendant  
14 SALVADOR ORTIZ-PADILLA

15 PHILLIP A. TALBERT  
16 United States Attorney

17 Date: September 8, 2023

/s/ Justin Gilio  
18 JUSTIN GILIO  
19 Assistant United States Attorney  
20 Attorney for Plaintiff  
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**ORDER**

**IT IS SO ORDERED.** The trial currently set for October 24, 2023, is hereby vacated. A change of plea hearing is set for October 23, 2023, at 10:00 a.m.

The time through October 23, 2023, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: **September 8, 2023**

  
UNITED STATES DISTRICT JUDGE